

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

RICK ALAN DAVIDSON,

Debtor.

Chapter 7
Case No. 19-11486 (DSJ)

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SALVATORE LaMONICA, Solely in His Capacity
as Chapter 7 Trustee of the Estate of Rick Alan Davidson,

Plaintiff,

-against-

Adv. Pro. No. 21-01126 (DSJ)

AMERICAN EXPRESS COMPANY, AMERICAN
EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC., AMERICAN EXPRESS
CREDIT CORPORATION, AMERICAN
EXPRESS NATIONAL BANK F/K/A
AMERICAN EXPRESS CENTURION BANK AND
SUCCESSOR BY MERGER TO AMERICAN
EXPRESS BANK, FSB, and BELLATOUR, LLC,

Defendants.

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STIPULATION FURTHER EXTENDING TIME TO RESPOND TO THE COMPLAINT

Plaintiff Salvatore LaMonica, solely in his capacity as Chapter 7 Trustee of the estate of Rick Alan Davidson (“Plaintiff”) and Defendants American Express Company, American Express Travel Related Services Company, Inc., American Express Credit Corporation, American Express National Bank f/k/a American Express Centurion Bank and Successor by Merger to American Express Bank, FSB (“American Express Defendants”) (collectively, the “Parties”) hereby stipulated and agree as follows:

- (i) Arnall Golden Gregory, LLP was authorized to accept service of process of the Summons and Complaint in the above-referenced matter on behalf of the American Express Defendants and has acknowledged that it had timely received service of same;

- (ii) The time by which the American Express Defendants were to answer or otherwise respond to the Complaint was extended to and through July 8, 2021 by stipulation so-ordered by the Court on May 13, 2021 [Dkt. No. 5]; and
- (iii) In that stipulation, the American Express Defendants waived any objection to service of process of the Summons and Complaint or personal jurisdiction of the Court over them, but otherwise preserved and retained all defenses and objections to the Complaint; and
- (iv) The American Express Defendants have requested and the Trustee has consented to further extend the time by which the American Express Defendants must answer or otherwise respond to the Complaint to and through July 29, 2021.

IT IS HEREBY STIPULATED between the Parties that the time by which the American Express Defendants must answer or otherwise respond to the Complaint is further extended to and through July 29, 2021.

Dated: June 30, 2021
Atlanta, Georgia

ARNALL GOLDEN GREGORY LLP
Attorneys for American Express Defendants

By: /s/ Darryl S. Laddin
Darryl S. Laddin, Esq.
171 17th Street NW, Suite 2100
Atlanta, Georgia 30363
Tel. (404) 873-8120

Dated: June 30, 2021
Wantagh, New York

LAMONICA HERBST & MANISCALCO, LLP
*Attorneys for Salvatore LaMonica, Solely in His
Capacity as Chapter 7 Trustee of the Estate of Rick
Alan Davidson*

By: /s/ David A. Blansky
David A. Blansky, Esq.
3305 Jerusalem Avenue
Wantagh New York 11793
Tel. (516) 826-6500

SO ORDERED:

Dated: New York, New York
July 1, 2021

s/ David S. Jones
HONORABLE DAVID S. JONES
UNITED STATES BANKRUPTCY JUDGE